



AMERICAN RADIO BROKERS INC/SFO

1255 POST STREET / SUITE 625
SAN FRANCISCO, CALIFORNIA 94109
415 + 441-3377

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SEP 21 1992

Federal Communications Commission
Office of the Secretary

September 18, 1992

Ms. Donna Searcy, Secretary
Federal Communications Commission
1919 M Street, Room 222
Washington, D.C. 20036

Dear Madam Secretary,

Enclosed is an original and four copies of Reply Comments made by American Radio Brokers, Inc. about a proposed new allocation to the FM table of Allotments, FM Stations (Ludlow, Ca.) MM Docket 92-148, Rm 8022.

Please accept these reply comments and add our name to the service list so we receive a copy of the determination made in this matter.

Thank you for your help.

Sincerely,

Chester P. Coleman,
President, American
Radio Brokers, Inc.

ENCL: REPLY COMMENT
1 ORIGINAL, SIGNED
AND FOUR COPIES FOR FILING

COPIES TO: DAVID TILOTSON, ESQ.
FRED COTE; KOLA, INC.

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Before the
Federal Communications Commission
Washington, D. C. 20564

SEP 21 1992

Federal Communications Commission
Office of the Secretary

MM Docket 92-148
RM-8022

"A.R.B." is involved through our media brokerage and radio station management organization as agent for KOLA Inc., licensee of KOLA (FM), San Bernardino, Ca. "A.R.B." has negotiated a sale of KOLA (FM) to S.B.R. Broadcasting, licensee of KCAL (FM), Redlands, CA.

KOLA Inc. has filed separate reply comments requesting consideration of channel 243 B1 instead of channel 261 B1 for use at Ludlow, Ca.

"A.R.B." notes that there is already a Construction Permit issued for a new Class "A" FM station at Ludlow, California. Perhaps the B1 proposal should be further amended to one or more class A channels as shown in the KHWY, Inc. comments.

LUDLOW, CALIFORNIA, (population, maybe 35 people not including animals) while it is an incorporated town, has no local government, no streets (except for one highway offramp), no post office, no schools, no laundromat, no churches, no grocery or general store. There IS a Chevron gas station, a Texaco gas station, truck stop, motel and Cafe. While Ludlow cannot be described as Hell on Earth, it can be seen from there.

Ludlow does not have ANY neighboring communities or significant population groupings. Located on Interstate 40, it is approximately 50 miles east of Barstow and 90 miles due west of Needles. While people exist at Newberry Springs and Amboy located along the same highway, which is all undeveloped Mohave Desert, it is estimated that less than 400 total people try to live at these two desert outposts. There are no planned community developments for this desolate, barren, wilderness area.

The only occasional, sporadic, employer in the local area is the Bagdad Chase Mine which opens and closes as often as the swinging doors of a wild west saloon. To really describe Ludlow as a "community" is taking much poetic license, but it seems the Commission is duty bound to allocate new channels whether or not they truly serve the public interest.

Note that when KRXV Inc. (now KHWY Inc.) petitioned the Commission to establish their "highway stations" to Yermo and Mountain Pass, CA.; they defined the Interstate traffic between the High Desert and Las Vegas as a "community". The proposed channel at Ludlow does not meet that criteria.

"A.R.B." has had extensive dealings with several licensed stations in the High Desert area, including Laughlin, NV., Barstow, Victorville, Apple Valley, and Needles, California. We have sold and consulted several stations in these areas that are destination points for people driving away from Ludlow.

The Commission has added many new FM channels, particularly in the Barstow and Laughlin areas. While the Commission does not consider economic impact in these allocations, the actual amount of service to the public is diminished by too many area stations that attract naive or parasitic operators that usually go broke.

In following the F.C.C. "Docket Dogma" such as three class A channels assigned to Lenwood, Ca. (an offramp at the west end of Barstow with a truck wash and a Dairy Queen as it's community);

note that the greater Lenwood/Barstow Metroplex with a total population of 21,000 now has poorer service from almost 8 FMs and 2AMs than it had when only 2 AMs and 1 FM were located there. "Almost" is used since 5 of the FM stations haven't been built yet. These new station permittees typically are inexperienced and/or under-financed and they bring more competition for a very limited local advertising base. Before the advent of these additional stations the area had better radio service, since the station operators were able to employ excellent staffs and do meaningful local radio.

"A.R.B." is not against new opportunities for new radio stations or worthwhile new competition, but the Commission should look to Canada as their criteria for new services in a market. The Canadian method works far better than the buckshot approach of these new proposed allotments.

Finally, the initial channel 261 B1 should not be allotted to Ludlow as it restricts future site changes of KOLA (FM) and KHWY (FM) that may provide service to new areas by existing licensees that have demonstrated their long term service to their regional areas. Both stations are "super power" Class B channels operating with facilities in excess of 50,000 watts at 500' H.A.A.T.

KOLA (FM) will be precluded from making dramatic coverage improvements in the San Bernardino Mountains instead of it's present Box Springs Mountain location between Riverside and San Bernardino (the city of license). The present Box Springs KOLA site does have shadowing to a small part of San Bernardino and severely shadows many parts of the city of Redlands (the third largest city in the 70dbu coverage area).

While "A.R.B." has a client interested in applying for a new station at Ludlow, CA. (for their own special reasons), we have serious doubts that an additional FM channel of ANY class of service is in the public interest. None the less, if a second allotment is to be at Ludlow, CA. then we request SUBSTITUTION of channel 243 B1 or one of the several class A channels that can be assigned to Ludlow, Ca. as it's second FM service.

Respectfully submitted



Chester Coleman, President
American Radio Brokers, Inc.
1255 Post St. Suite 625
San Francisco, Ca. 94109